

Joel E. Tasca  
Nevada Bar No. 14124  
Lindsay C. Demaree  
Nevada Bar No. 11949  
Holly Ann Priest  
Nevada Bar No. 13226  
BALLARD SPAHR LLP  
1980 Festival Drive Plaza, Suite 900  
Las Vegas, Nevada 89135  
Telephone: (702) 471-7000  
Facsimile: (702) 471-7070  
E-mail: tasca@ballardspahr.com  
E-mail: demareel@ballardspahr.com  
E-mail: priesth@ballardspahr.com

*Attorneys for Defendant Capital One  
Bank (USA), N.A.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

RAY STOLLER,

Plaintiff,

v.

CAPITAL ONE BANK (USA), N.A.

Defendants.

Civil Action No.: 2:19-cv-01854-GMN-VCF

**STIPULATION TO EXTEND  
TIME FOR DEFENDANT TO RESPOND  
TO COMPLAINT**

**(First Request)**

Defendant Capital One Bank (USA), N.A.'s (Capital One") response to Plaintiff Ray Stroller's (Plaintiff") complaint was due on November 15, 2019. Capital One and the Plaintiff have agreed that Capital One has up to and including December 15, 2019, to respond to Plaintiff's complaint. Good cause supports the requested extension. The parties have been actively discussing the potential for an early resolution of this case. The extension will provide time for the parties to investigate and evaluate Plaintiff's allegations and if needed, allow Capital One to prepare a response. In addition, the timing of this stipulation is the result of excusable neglect, as Capital One just retained the undersigned defense counsel. This is the first request for an extension, and it is

*[Continued on following page.]*

made in good faith and not for the purposes of delay.

**IT IS SO STIPULATED.**

Respectfully submitted this 6th day of December, 2019.

BALLARD SPAHR LLP

LAW OFFICES OF NICHOLAS M. WADJA

*By: /s/ Lindsay C. Demaree*

*By: /s/ Nicholas M. Wadja*

Joel E. Tasca

Nicholas M. Wadja, Esq.

Nevada Bar No. 14124

871 Coronado Center Dr., Ste. 200

Lindsay C. Demaree

Henderson, Nevada 89052

Nevada Bar No. 11949

nick@recoverylawgroup.com

Holly Ann Priest

Nevada Bar No. 13226

1980 Festival Plaza Drive, Suite 900 *Attorney for Plaintiff Ray Stoller*

Las Vegas, Nevada 89135-2958

tasca@ballardspahr.com

demareel@ballardspahr.com

priesth@ballardspahr.com

*Attorneys for Defendant Capital*

*One Bank (USA), N.A.*

**IT IS SO ORDERED:**

  
UNITED STATES MAGISTRATE JUDGE

DATED: 12-10-2019